

1 JARED P. GREEN, ESQ.
Nevada Bar No. 10059
2 TODD W. BAXTER, ESQ.
Admitted Pro Hac Vice
3 McCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH LLP
4 8337 West Sunset Road, Suite 350
Las Vegas, NV 89113
5 Telephone: (702) 949-1100
Facsimile: (702) 949-1101
6 *jared.green@mccormickbarstow.com*
todd.baxter@mccormickbarstow.com

7 ERON Z. CANNON, ESQ.
8 Nevada Bar No. 8013
FAIN ANDERSON VANDERHOEF ROSENDAHL
9 O'HALLORAN SPILLANE PLLC
701 Fifth Avenue, Suite 4750
10 Seattle, WA 98104
Telephone: (206) 749-0094
11 Facsimile: (206) 749-0194
eron@favros.com

12 Attorneys for Plaintiffs/Counterdefendants

13
14 UNITED STATES DISTRICT COURT
15 DISTRICT OF NEVADA
16

17 ALLSTATE INSURANCE COMPANY,
ALLSTATE PROPERTY & CASUALTY
18 INSURANCE COMPANY, ALLSTATE
INDEMNITY COMPANY, and ALLSTATE
19 FIRE & CASUALTY INSURANCE
COMPANY,

20 Plaintiffs,

21 v.

22 RUSSELL J. SHAH, MD, DIPTI R. SHAH,
23 MD, RUSSELL J. SHAH, MD, LTD., DIPTI
R. SHAH, MD, LTD., and RADAR
24 MEDICAL GROUP, LLP dba UNIVERSITY
URGENT CARE, DOES 1-100, and ROES
25 101-200,

26 Defendants.

27 AND RELATED CLAIMS
28

CASE NO. 2:15-cv-1786-APG-CWH

**STIPULATION AND ORDER TO
EXTEND TIME FOR RESPONSE TO
DEFENDANTS' OBJECTION TO U.S.
MAGISTRATE JUDGE'S APRIL 19, 2018
ORDER [ECF NO. 271] GRANTING IN
PART AND DENYING IN PART
DEFENDANTS' MOTION TO QUASH OR
MODIFY SUBPOENAS AND FOR
PROTECTIVE ORDER [ECF NOS. 227
AND 228]**

(First Request)

1 Plaintiffs/Counterdefendants ALLSTATE INSURANCE COMPANY, ALLSTATE
2 PROPERTY & CASUALTY INSURANCE COMPANY, ALLSTATE INDEMNITY COMPANY,
3 and ALLSTATE FIRE & CASUALTY INSURANCE COMPANY, by and through their attorneys of
4 record of the law firms McCORMICK, BARSTOW, SHEPPARD, WAYTE & CARRUTH LLP, and
5 FAIN ANDERSON VANDERHOEF ROSENDAHL O'HALLORAN SPILLANE PLLC, and
6 Defendants and Counterclaimant RUSSELL J. SHAH, M.D., DIPTI R. SHAH, M.D., RUSSELL J.
7 SHAH, MD, LTD., DIPTI R. SHAH, MD, LTD., and RADAR MEDICAL GROUP, LLP dba
8 UNIVERSITY URGENT CARE, by and through their attorneys of record of the law firm BAILEY
9 KENNEDY, hereby stipulate and agree as follows:

- 10 1. On May 3, 2018, Defendants filed an Objection to U.S. Magistrate Judge's April 19,
11 2018 Order [ECF No. 271] Granting in Part and Denying in Part Defendants' Motion
12 to Quash or Modify Subpoenas and for Protective Order [ECF Nos. 227 and 228];
- 13 2. Plaintiffs presently have until May 17, 2018, to respond to Defendants' Objection to
14 Magistrate Judge's April 19, 2018 Order;
- 15 3. Due to counsel for Plaintiffs, Dylan Todd, being in trial in the Eighth Judicial District
16 Court in the matter of *Galvan v. JMR & CLS, INC.*, case number A-15-724639-C,
17 Department XXXI with the Honorable Joanna S. Kishner, Plaintiffs shall now have
18 until May 24, 2018 to file the Response to Defendants' Objection to Magistrate
19 Judge's April 19, 2018 Order; and

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 4. This is the first Stipulation to extend the deadline for the Response to the Objection.

2 This Stipulation is made in good faith and not to delay the proceedings.

3 IT IS SO STIPULATED.

4 DATED this 17th day of May, 2018.

5 McCORMICK, BARSTOW, SHEPPARD,
6 WAYTE & CARRUTH LLP

7 By //s// Dylan P. Todd
8 DYLAN P. TODD, ESQ.
9 Nevada Bar No. 10456
10 TODD W. BAXTER, ESQ.
11 Admitted Pro Hac Vice
12 8337 West Sunset Road, Suite 350
13 Las Vegas, NV 89113

14 ERON Z. CANNON, ESQ.
15 Nevada Bar No. 8013
16 FAIN ANDERSON VANDERHOEF
17 ROSENDAHL O'HALLORAN SPILLANE PLLC
18 701 Fifth Avenue, Suite 4750
19 Seattle, WA 98104

20 Attorneys for Plaintiffs/Counterdefendants

21 DATED this 17th day of May, 2018.

22 BAILEY KENNEDY

23 By //s// Joshua P. Gilmore
24 DENNIS L. KENNEDY, ESQ.
25 Nevada Bar No. 1462
26 JOSEPH A. LIEBMAN, ESQ.
27 Nevada Bar No. 10125
28 JOSHUA P. GILMORE, ESQ.
 Nevada Bar No. 11576
 8984 Spanish Ridge Avenue
 Las Vegas, NV 89148
 Attorneys for Defendants & Counterclaimant

29 IT IS SO ORDERED.

30 
31 UNITED STATES MAGISTRATE JUDGE

32 DATED: May 22, 2018